REMARKS

35 U.S.C. §112 Rejections

The Office has rejected claims 3, 14, and 25, under 35 U.S.C. §112, as having insufficient antecedent basis. Applicants have amended claims 3, 14, and 25, which now depend from a corresponding claim having antecedent basis for "XML representation." Therefore, Applicants respectfully request withdrawal of the 35 U.S.C. §112 rejections.

Claims 1, 4-9, 11, 12, 15-20, 22, 23, 26-31, and 33 are Allowable

The Office has rejected claims 1, 4-9, 11, 12, 15-20, 22, 23, 26-31, and 33, at paragraphs 4-14 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Pat. Pub. No. 2001/0047332 ("Gonen-Friedmann"). Applicants respectfully traverse the rejections.

None of the cited references, including Gonen-Friedmann, discloses or suggests the specific combination of claim 1. For example, Gonen-Friedmann does not disclose or suggest providing a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. In contrast to claim 1, Gonen-Friedmann discloses a nested pull down menu prompting a user to select a reason code, such as selecting an invoice portion that is a subject of a dispute, e.g., reason code S2a3 labeled "the user disputes a specific invoice line." *See* Gonen-Friedmann, paragraph 0037, and Fig. 4. Further, in Gonen-Friedmann the selected code may be mapped to a separate user interface that prompts the user to enter information relevant to the selected reason code. *See* Gonen-Friedmann paragraph 0038. In Gonen-Friedmann, selecting the code S2a3 enables the user to enter requested information, such as identifying the line in question, via a separate interface. *See* Gonen-Friedmann, paragraph 0038. Gonen-Friedmann does not disclose or suggest multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type.

Further, the Office Action admits that Gonen-Friedmann <u>does not explicitly disclose</u> that the user interface provides <u>multiple links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. *See* Office Action, paragraph 6. Additionally, Gonen-Friedmann does not suggest <u>multiple user-selectable links to multiple destinations</u> for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. Instead, Gonen-Friedmann discloses selecting a reason code for a dispute and at least a disputed amount. *See* Gonen-Friedmann, paragraph 0018. Further, the Office has not provided any motivation to modify Gonen-Friedmann to suggest this element of claim 1.

The Office has not demonstrated a prima facie case of obviousness. To reject claims in an application under section 103, an examiner must show an unrebutted prima facie case of obviousness. *See* Rouffett, 149 F.3d at 1355 (Fed. Cir. 1998), and MPEP 2143.01. A statement that modifications of the prior art to meet the claimed invention would have been "'well within the ordinary skill of the art at the time the claimed invention was made'" because the references relied upon teach that all aspects of the claimed invention were individually known in the art is <u>not sufficient</u> to establish a *prima facie* case of obviousness <u>without some objective reason to combine the teachings of the references</u>. (emphasis added) *Ex parte Levengood*, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993). *See also In re Kotzab*, 217 F.3d 1365, 1371, 55 USPQ2d 1313, 1318 (Fed. Cir. 2000). *See also* MPEP 2143.01 IV. Often, it will be necessary to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. To facilitate review, this analysis should be made explicit. *See KSR International Co. v. Teleflex, Inc., et al., No. 04-1350 at p. 14* (U.S., April 30, 2007). Therefore, in formulating a rejection under 35 U.S.C. §103(a) based upon a combination of prior art elements, it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed. *U.S. Patent and Trademark Office Memorandum of May 3, 2007, Margaret A. Focarino, Deputy Commissioner for Patent Operations*. The Office Action has not

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demonstrated a motivation to modify Gonen-Friedmann to disclose or suggest each and every element of claim 1.

For at least the reasons presented above, claim 1 is allowable over the cited references. Accordingly, Applicants respectfully request that the §103(a) rejection of claim 1 be withdrawn.

Claims 4-9 and 11 depend from claim 1, which Applicants have shown to be allowable. Hence, Gonen-Friedmann fails to disclose or suggest at least one element of each of claims 4-9 and 11. Accordingly, claims 4-9 and 11 are also allowable, at least by virtue of their dependence from claim 1.

Further, the dependent claims recite additional features that are not disclosed or suggested by the cited references. For example, Gonen-Friedmann does not disclose or suggest multiple user-selectable links for a line item that include a first link to question the line item and a second link to dispute the line item as recited in claim 4, multiple user-selectable links that include a first link to question the line item and a second link to correct the line item, as recited in claim 5, or multiple user-selectable links that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, as recited in claim 6. Instead, Gonen-Friedmann discloses selecting a reason code for a dispute and a disputed amount. *See* Gonen-Friedmann, paragraph 0018. For these additional reasons, claims 4-6 are allowable.

None of the cited references, including Gonen-Friedmann, discloses or suggests the specific combination of claim 12. For example, Gonen-Friedmann does not disclose or suggest a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 12. Instead, Gonen-Friedmann discloses a system that displays a nested pull down menu prompting a user to select a reason code, such as selecting an invoice portion that is a subject of a dispute, e.g., reason code S2a3 labeled "the user disputes a specific invoice line." *See* Gonen-Friedmann, paragraph 0037, and Figs. 1, 3, 4 and 5. Further, in Gonen-Friedmann the selected code may be mapped to a separate user interface that prompts the user to enter information relevant to the selected reason

code. *See* Gonen-Friedmann paragraph 0038. In Gonen-Friedmann, selecting the code S2a3 enables the user to enter requested information, such as identifying the line in question, via a separate interface. *See* Gonen-Friedmann, paragraph 0038. Gonen-Friedmann does not disclose or suggest a user interface that provides multiple <u>user-selectable links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type, as in claim 12.

The Office Action admits that Gonen-Friedmann does not explicitly disclose that the user interface provides <u>multiple links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type. *See* Office Action, paragraph 6. Instead, Gonen-Friedmann discloses selecting a reason code for a dispute and at least a disputed amount. *See* Gonen-Friedmann, paragraph 0018. Further, the Office has not provided any motivation to modify Gonen-Friedmann to suggest this element of claim 12.

Accordingly, the Office has not demonstrated a prima facie case of obviousness. To reject claims in an application under section 103, an examiner must show an unrebutted prima facie case of obviousness. *See* Rouffett, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998), and MPEP 2143.01. The Office Action has not demonstrated a motivation to modify Gonen-Friedmann to disclose or suggest each and every element of claim 12.

For at least the reasons presented above, claim 12 is allowable over the cited references. Therefore, Applicants respectfully request that the §103(a) rejection of claim 12 be withdrawn.

Claims 15-20 and 22 depend from claim 12, which Applicants have shown to be allowable. Hence, Gonen-Friedmann fails to disclose or suggest at least one element of each of claims 15-20 and 22. Accordingly, claims 15-20 and 22 are also allowable, at least by virtue of their dependence from claim 12.

Further, the dependent claims recite additional features that are not disclosed or suggested by the cited references. For example, Gonen-Friedmann does not disclose or suggest that the multiple user-selectable links include a plurality of electronic mail addresses, as recited in claim 19. Instead, Gonen-Friedmann discloses that a notification may be generated to notify

one or more selected accounts receivable personnel of the vendor of a generation of a Credit Memo Request. *See* Gonen-Friedmann, paragraph 0041. Gonen-Friedmann does not disclose or suggest multiple user-selectable links that include a plurality of electronic mail addresses. For this additional reason, claim 19 is allowable.

None of the cited references, including Gonen-Friedmann, discloses or suggests the specific combination of claim 23. For example, Gonen-Friedmann does not disclose or suggest a computer-readable medium having computer-readable program code to direct a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 23. Instead, Gonen-Friedmann discloses a system that displays a nested pull down menu prompting a user to select a reason code, such as selecting an invoice portion that is a subject of a dispute, e.g., reason code S2a3 labeled "the user disputes a specific invoice line." *See* Gonen-Friedmann, paragraph 0037, and Figs. 1, 3, 4 and 5. Further, in Gonen-Friedmann the selected code may be mapped to a separate user interface that prompts the user to enter information relevant to the selected reason code. *See* Gonen-Friedmann paragraph 0038. In Gonen-Friedmann, selecting the code S2a3 enables the user to enter requested information, such as identifying the line in question, via a separate interface. *See* Gonen-Friedmann, paragraph 0038. Gonen-Friedmann does not disclose or suggest <u>a line-by-line user interface</u> to enable a user to question individual line items in a transaction, where the user interface provides multiple <u>user-selectable links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type.

The Office Action admits that Gonen-Friedmann does not explicitly disclose that the user interface provides <u>multiple links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type. *See* Office Action, paragraph 6. Further, Gonen-Friedmann does not suggest that the user interface provides multiple <u>user-selectable links to multiple destinations for multiple question types per line item</u> to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 23. Instead, Gonen-Friedmann discloses selecting a reason code for a

dispute and a disputed amount. *See* Gonen-Friedmann, paragraph 0018. Further, the Office has not provided any motivation to modify Gonen-Friedmann to disclose or suggest this element of claim 23. Thus, the Office has not demonstrated a prima facie case of obviousness.

For at least the reasons presented above, claim 23 is allowable over the cited references. Accordingly, Applicants respectfully request that the §103(a) rejection of claim 23 be withdrawn.

Further, the dependent claims recite additional features that are not disclosed or suggested by the cited references. For example, Gonen-Friedmann does not disclose or suggest multiple user-selectable links for a line item that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, as recited in claim 28, or multiple user-selectable links that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, where the amount is an amount of time, as recited in claim 29. For this additional reason, claims 28 and 29 are allowable.

Further, Gonen-Friedmann does not disclose or suggest that the multiple user-selectable links include a plurality of electronic mail addresses, as recited in claim 30. Instead, Gonen-Friedmann discloses that a notification may be generated to notify one or more selected accounts receivable personnel of the vendor of the generation of the Credit Memo Request. *See* Gonen-Friedmann, paragraph 0041. Gonen-Friedmann does not disclose or suggest multiple user-selectable links including a plurality of electronic mail addresses. For this additional reason, claim 30 is allowable.

Claims 2, 3, 13, 14, 24, and 25 are Allowable

The Office has rejected claims 2, 3, 13, 14, 24, and 25, at paragraphs 15-19 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Gonen-Friedmann in view of U.S. Pat. Pub. No. 2003/0051226 ("Zimmer"). Applicants respectfully traverse the rejections.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 1, from which claims 2 and 3 depend. Zimmer does not disclose or suggest the

elements of claim 1 that are not disclosed or suggested by Gonen-Friedmann. For example, Gonen-Friedmann does not disclose or suggest providing a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. Zimmer does not disclose or suggest this element of claim 1. Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, Gonen-Friedmann and Zimmer, separately or in combination, do not disclose or suggest each and every element of claim 1, or of claims 2 and 3, by virtue of their dependence from claim 1.

Further, the Office Action admits that Gonen-Friedmann does not disclose or suggest processing an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, where the XML representation includes tags within which the multiple user-selectable links per line item are defined, as recited in claim 2. Additionally, Zimmer does not disclose or suggest a XML representation that includes tags within which multiple user-selectable links per line item are defined, as recited in claim 2. Therefore, the combination of Gonen-Friedmann and Zimmer does not disclose or suggest this element of claim 2. For this additional reason, claim 2 is allowable.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 12, from which claims 13 and 14 depend. Zimmer does not disclose or suggest the elements of claim 12 that are not disclosed or suggested by Gonen-Friedmann. For example, For example, Gonen-Friedmann does not disclose or suggest a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 12. Zimmer also does not disclose or suggest this element of claim 12. Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, Gonen-Friedmann and Zimmer, separately or in combination, do

not disclose or suggest each and every element of claim 12, or of claims 13 and 14, by virtue of their dependence from claim 12.

Further, the Office Action admits that Gonen-Friedmann does not disclose or suggest that the computer system includes a user interface creator to process an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, where the XML representation includes tags within which the multiple links per line item are defined. *See* Office Action, paragraph 16. Additionally, Zimmer does not disclose or suggest that the computer system includes a user interface creator to process an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, where the XML representation includes tags within which the multiple user-selectable links per line item are defined, as recited in claim 13. Therefore, the combination of Gonen-Friedmann and Zimmer does not disclose or suggest this element of claim 13. For this additional reason, claim 13 is allowable.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 23, from which claims 24 and 25 depend. Zimmer does not disclose or suggest the elements of claim 23 that are not disclosed or suggested by Gonen-Friedmann. For example, Gonen-Friedmann does not disclose or suggest a computer-readable medium having computer-readable program code to direct a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 23. Zimmer does not disclose or suggest this element of claim 23. Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, Gonen-Friedmann and Zimmer, separately or in combination, do not disclose or suggest each and every element of claim 23, or of claims 24 and 25 by virtue of their dependence from claim 23.

Further, the Office Action admits that Gonen-Friedmann does not disclose or suggest that the computer-readable program code directs the computer system to process an extensible Markup Language (XML) representation of each of the individual line items to create the line-

by-line user interface, wherein the XML representation includes tags within which the multiple links per line item are defined. *See* Office Action, paragraph 16. Additionally, Zimmer does not disclose or suggest a computer-readable program code that directs a computer system to process an extensible Markup Language (XML) representation of each of the individual line items to create a line-by-line user interface, wherein the XML representation includes tags within which the multiple user-selectable links per line item are defined, as recited in claim 24. Therefore, the combination of Gonen-Friedmann and Zimmer does not disclose or suggest this element of claim 24. For this additional reason, claim 24 is allowable.

Claims 10, 21 and 32 are Allowable

The Office has rejected claims 10, 21 and 32, at paragraphs 20-22 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Gonen-Friedmann in view of U.S. Patent No. 5,948,054 ("Nielson"). Applicants respectfully traverse the rejections.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 1, from which claim 10 depends. Nielson does not disclose or suggest the elements of claim 1 that are not disclosed or suggested by Gonen-Friedmann. For example, Gonen-Friedmann does not disclose or suggest providing a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. Nielson does not disclose or suggest this element of claim 1. Instead, Nielson discloses a system in which a question is received from a human customer by a server, and the server polls qualified human consultants for an answer. *See* Nielson, Abstract. If one of the qualified consultants decides to provide the requested information, the server receives the information and sends the information to the human customer via the customer's computer. *See* Nielson, Abstract. Therefore, Gonen-Friedmann and Nielson, separately or in combination, do not disclose or suggest each and every element of claim 1, or of claim 10, which depends from claim 1. Hence, claim 10 is allowable over Gonen-Friedmann in view of Nielson.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 12, from which claim 21 depends. Nielson does not disclose or suggest the

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elements of claim 12 that are not disclosed or suggested by Gonen-Friedmann. For example, Gonen-Friedmann does not disclose or suggest a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 12. Nielson does not disclose or suggest this element of claim 12. Instead, Nielson discloses a system in which a question is received from a human customer by a server, and the server polls qualified human consultants for an answer. *See* Nielson, Abstract. If one of the qualified consultants decides to provide the requested information, the server receives the information and sends the information to the human customer via the customer's computer. *See* Nielson, Abstract. Therefore, Gonen-Friedmann and Nielson, separately or in combination, do not disclose or suggest each and every element of claim 12, or of claim 21, which depends from claim 12. Hence, claim 21 is allowable over Gonen-Friedmann in view of Nielson.

As explained above, Gonen-Friedmann does not disclose or suggest each and every element of claim 23, from which claim 32 depends. Nielson does not disclose or suggest the elements of claim 23 that are not disclosed or suggested by Gonen-Friedmann. For example, Gonen-Friedmann does not disclose or suggest a computer-readable medium having computer-readable program code to direct a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 23. Nielson does not disclose or suggest this element of claim 23. Instead, Nielson discloses a system in which a question is received from a human customer by a server, and the server polls qualified human consultants for an answer. *See* Nielson, Abstract. If one of the qualified consultants decides to provide the requested information, the server receives the information and sends the information to the human customer via the customer's computer. *See* Nielson, Abstract. Therefore, Gonen-Friedmann and Nielson, separately or in combination, do not disclose or suggest each and every element of claim 23, or of claim 32, which depends from claim 12. Hence, claim 32 is allowable over Gonen-Friedmann in view of Nielson.

CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this response, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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_11- 9- 2007_
Date

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